

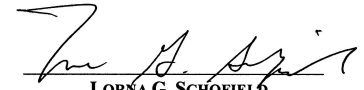
Via ECF

June 20, 2025

Honorable Lorna G. Schofield
United States District Court
Southern District of New York
40 Foley Square, Courtroom 1106
New York, NY 10007

Application **GRANTED**. NG's deadline to respond is extended to **July 15, 2025**. The conference scheduled for July 8, 2025, is **ADJOURNED to August 5, 2025, at 3:00 P.M.**

Dated: June 23, 2025
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

Re: *The Travelers Indem. Co., et al v. Northrop Grumman Corp.*,
Case No. 1:16-cv-08778-LGS [rel. 1:12-cv-3040-KBF]

Dear Judge Schofield:

Northrop Grumman (“NG”) respectfully requests that the Court extend by 21 days the deadline for NG to file a response to the Court’s June 10, 2025 Order (ECF 495), which concerns a motion to unseal by Intervenor Town of Oyster Bay (“Town”). The existing due date for NG’s response is June 24, 2025. NG requests an extension through July 15, 2025. NG also requests an adjournment of the conference currently scheduled for July 8, 2025, to a date at the Court’s convenience after any necessary submission by NG. This is NG’s first request for an extension. Counsel for the parties conferred and the Town is not expected to oppose NG’s request, but, given the holiday yesterday, could not respond before the deadline for this request.

In the June 10 Order, the Court granted the Town’s application to intervene for the purpose of pursuing a motion to unseal certain documents. The Court directed NG to file any objections to unsealing and/or proposed redactions regarding the documents at issue, taking into account “the Town’s interest in accessing the documents” and other factors. ECF 495. The Court directed NG to submit a response by June 24, 2025, and set a conference for July 8, 2025. *Id.*

NG seeks an extension for two reasons. *First*, prior to the Town’s filing, NG and the Town had begun efforts to obviate this dispute. NG does not oppose the Town having access to documents concerning the historical use and disposal of chemicals in the Park resulting from NG’s efforts to help the Navy during wartime. To the contrary, through ongoing litigation between the parties, NG has produced documents on that topic and NG believes any such documents filed under seal in this matter have already been provided to the Town. The parties need additional time to confirm that belief and NG believes the parties should be able to resolve their dispute without further burdening this Court. At a minimum, NG anticipates that the parties can substantially narrow any necessary motion to unseal, which would reduce the burdens on the Court and the parties. To allow for continued negotiations, NG requests a brief extension. Should the parties reach an agreement that obviates the need for the Town to pursue its motion, the parties will promptly advise the Court.

Second, the parties are discussing the scope of the relief the Town seeks. There are issues in this matter, including notice to insurers, about which NG maintains the Town has no interest. That said, NG has been diligently reviewing all of the more than 500 documents potentially at issue in response to the Court’s Order, which issued prior to NG’s time to respond to the Town’s letter. Due to the volume, age, and complexity of the materials, which were filed more than a decade ago, as well as the turnover of personnel who are most familiar with the materials submitted

in 2013, NG submits that additional time is independently warranted to allow for an adequate review of the documents in advance of any necessary submission.

For these reasons, NG requests that the deadline for NG to file any response to the Court's June 10 Order be extended through July 15, 2025, and NG requests that the Court adjourn the scheduled conference until after any submission by NG.

Respectfully submitted,

COVINGTON & BURLING LLP

By: Daniel L. Russell Jr.

Georgia Kazakis
Daniel L. Russell Jr.
One CityCenter
850 Tenth Street, NW
Washington, DC 20001-4956
Tel: (202) 662-6000
gkazakis@cov.com
drussell@cov.com

*Attorneys for Defendants Northrop Grumman
Corporation and Northrop Grumman Systems
Corporation*